

Pullum Window Corporation

**12950 Lyndon Ave.
Detroit, Mi., 48227**

&

**415 N.Lafayette
South Lyon, Mi., 48178**

Re: The Michigan Energy Code

I am the vice-president of Pullum Window Corporation. Pullum Window Corporation is a fourth generation family owned business that has manufactured and distributed window and door products since 1921. We have one factory at 12950 Lyndon Ave, Detroit where we began and a second factory at 415 N.Lafayette, South Lyon, Mi which we started in 1960.

We are a Michigan corporation with 30 to 40 Michigan employees and a marketing area exclusively within the state of Michigan. The majority of our sales are for new construction but we also sell replacement windows. How the Legislature amends the law regarding the Michigan Uniform Energy Code and the potential negative consequences of doing so are very important to our company, our employees, and our customers.

Moving from the Michigan Uniform Energy Code (MUEC) to the International Energy Conservation Code (IECC) will force many of our Michigan window and insulated glass manufacturers to go out of business.

I have been involved in the Michigan window and door energy code evolution for at least 10 years. The following comments concern some, but not all, of the issues related to adopting the IECC.

Energy Star windows should be an option, not standard. The Energy Star windows will require Soft Coat low-e glass, unproven spacer concepts and argon gas. Soft Coat low-e glass requires a large manufacturing operation to support the equipment required to avoid damaging the delicate Low-e surface and edge deletion for sealant adhesion.

Hard Coat low-e is the low-e glass used by most small Michigan window manufacturers as well as some Michigan manufacturers of sealed insulated glass.

The costs of physical testing and NFRC approval under the IECC will be a major hardship on Michigan window and insulated glass manufacturers. The Michigan Uniform Energy Code took this into account when it provided for companies to use computer simulations or have their product approved by the Bureau of Construction Codes. This break for small Michigan companies would be lost if the IECC is adopted.

The concept of "all fenestration products in a building" satisfying the same R-value is not realistically possible. There will be many products like wood entry doors, glass block and other items that will not meet the requirement.

Forcing replacement windows to meet Energy Star standards hurts Michigan homeowners. As requirements become too restrictive the product price increases, placing unneeded hardships on lower-income home owners. Replacement windows should only need to be at least as efficient as the windows they replace. Owners of older homes should, if they choose, be able to replicate the original windows instead of installing Low-e glazing which will cost more and will appear noticeably different.

Michigan window and insulated glass manufactures need a Michigan energy code to understand and represent their interests. The national codes are a great advantage to the large national window manufacturers. These national companies have full time assigned personal to attend national code committee meetings, get on important committees and vote for their own interests.

The large window companies know that Soft coat Low-e and NFRC requirements will force their competition, Michigan's smaller window companies, out of business. The Michigan window industry which is made up of small companies is not represented in the ICC process.

I can not stress enough that is critical to have a unique Michigan energy code to address the issues important to Michigan window and glass manufacturers to avoid losing another category of jobs and businesses to other states.

I urge you not to harm Michigan home owners, future first-time home buyers and Michigan companies by substituting the International Energy Conservation Code" for our state-written, state-specific Michigan Uniform Energy Code!

Charlie Pullum
Pullum Window Corporation